

EXHIBIT A
TO DECLARATION OF ELLIOT B. GIPSON

Robert W. Dickerson (State Bar No. 89367)
rdickerson@orrick.com
Alyssa M. Caridis (State Bar No. 260103)
acaridis@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
777 South Figueroa Street
Suite 3200
Los Angeles, CA 90017
Telephone: +1-213-629-2020
Facsimile: +1-213-612-2499

Kai Tseng (State Bar No. 193756)
ktseng@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025
Telephone: +1-650-614-7400
Facsimile: +1-650-614-7401

Attorneys for Defendant
ACER Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

CYBERsitter, LLC a California limited
liability company, d/b/a Solid Oak
Software,

Plaintiff,

v.

The People's Republic of China, a
foreign state; Zhengzhou Jinhui
Computer System Engineering Ltd., a
Chinese corporation; Beijing Dazheng
Human Language Technology
Academy Ltd., a Chinese corporation;
Sony Corporation, a Japanese
corporation; Lenovo Group Limited, a
Chinese corporation; Toshiba
Corporation, a Japanese corporation;
ACER Incorporated, a Taiwanese
corporation; ASUSTeK Computer Inc.,
a Taiwanese corporation; BenQ
Corporation, a Taiwanese corporation;
Haier Group Corporation, a Chinese
corporation; DOES 1-10,

Defendants.

Case No. CV 10-0038 GAF (SHx)

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Complaint Served: April 28, 2010

Current Response Date: May 18, 2010

New Response Date: June 17, 2010

**[PROPOSED] ORDER FILED
CONCURRENTLY HERewith**

1 WHEREAS, plaintiff CYBERSitter, LLC (“CYBERSitter”) filed a Complaint
 2 for Misappropriation of Trade Secrets; Unfair Competition; Copyright
 3 Infringement; and Civil Conspiracy (“Complaint”) on January 5, 2010 against
 4 Defendants The People’s Republic of China; Zhengzhou Jinhui Computer System
 5 Engineering Ltd.; Beijing Dazheng Human Language Technology Academy Ltd.;
 6 Sony Corporation; Lenovo Group Limited; Toshiba Corporation; ACER
 7 Incorporated (“ACER”); ASUSTeK Computer Inc.; BenQ Corporation; Haier
 8 Group Corporation; and DOES 1-10;

9 WHEREAS, Defendant ACER was served on April 27, 2010;

10 WHEREAS, Defendant ACER was the first Defendant to be served;

11 WHEREAS, Defendants ACER Incorporated; ASUSTeK Computer Inc.;
 12 BenQ Corporation (collectively “the Taiwanese Defendants”) are the only
 13 Defendants that have been served to date;

14 WHEREAS, ACER is required to respond to the Complaint on or before
 15 May 18, 2010;

16 WHEREAS, Central District of California Local Rule 8-3 provides that the
 17 time within the defendants must answer or otherwise respond to the initial
 18 complaint can be extended by thirty (30) days by stipulation of the parties;

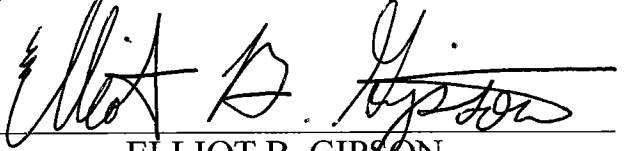
19 THE PARTIES HEREBY STIPULATE AND AGREE, by and through their
 20 attorneys of record, that the Taiwanese Defendants shall have up to and including
 21 June 17, 2010 to file and serve their responses to the Complaint pursuant to Local
 22 Rule 8-3. Moreover, as June 17, 2010 approaches, CYBERSitter and the Taiwanese
 23 Defendants will discuss whether a further extension on the time to respond to the
 24 Complaint is appropriate in light of the status of service of the Complaint on other
 25 defendants. The parties’ stipulation to this initial extension is without prejudice to
 26 their seeking a further extension (either by stipulation or Court order) to the
 27 Complaint or any documents filed in response thereto. Additionally, if any of the
 28 Taiwanese Defendants file a motion in response to the Complaint, CYBERSitter

1 will have a thirty (30) day extension to respond to such a motion.

2 IT IS SO STIPULATED.

3
4 Dated: May 17, 2010

Gipson Hoffman & Pancione

5
6 
7 ELLIOT B. GIPSON

8 Elliot B. Gipson (State Bar No. 234020)
9 EGipson@ghplaw.com
10 GIPSON HOFFMAN & PANCIONE
11 1901 Avenue of the Stars
12 Suite 1100
13 Los Angeles, CA 90067-6002
14 Telephone: +1-310-556-4660
15 Facsimile: +1-310-556-8945

16
17
18
19
20
21
22
23
24
25
26
27
28
Attorneys for Plaintiff CYBERsitter, LLC
d/b/a Solid Oak Software

1 Dated: May 17, 2010

Orrick, Herrington & Sutcliffe LLP

3 /s/ Robert W. Dickerson
4 ROBERT W. DICKERSON

5 Robert W. Dickerson (State Bar No. 89367)
rdickerson@orrick.com
6 Alyssa M. Caridis (State Bar No. 260103)
acaridis@orrick.com
7 ORRICK, HERRINGTON &
SUTCLIFFE LLP
8 777 South Figueroa Street
Suite 3200
9 Los Angeles, CA 90017
Telephone: +1-213-629-2020
10 Facsimile: +1-213-612-2499

11 Kai Tseng (State Bar No. 193756)
ktseng@orrick.com
12 ORRICK, HERRINGTON &
SUTCLIFFE LLP
13 1000 Marsh Road
Menlo Park, CA 94025
14 Telephone: +1-650-614-7400
Facsimile: +1-650-614-7401

15 Attorneys for Defendant
16 ACER Inc.

17 Dated: May _____, 2010

Willenken Wilson Loh & Lief LLP

19 PAUL J. LOH

20 Paul J. Loh (State Bar No. ____)
21 paulloh@willenken.com
22 WILLENKEN WILSON LOH & LIEB LLP
707 Wilshire Boulevard, Suite 3850
23 Los Angeles, California 90017
Telephone: +1-213-955-9240
24 Facsimile: +1-213-955-9250

25 Attorneys for Defendant BenQ Corp.

1 Dated: May _____, 2010

Orrick, Herrington & Sutcliffe LLP

2
3
4 ROBERT W. DICKERSON

5 Robert W. Dickerson (State Bar No. 89367)
rdickerson@orrick.com
6 Alyssa M. Caridis (State Bar No. 260103)
acaridis@orrick.com
7 ORRICK, HERRINGTON &
SUTCLIFFE LLP
8 777 South Figueroa Street
Suite 3200
9 Los Angeles, CA 90017
Telephone: +1-213-629-2020
10 Facsimile: +1-213-612-2499

11 Kai Tseng (State Bar No. 193756)
ktseng@orrick.com
12 ORRICK, HERRINGTON &
SUTCLIFFE LLP
13 1000 Marsh Road
Menlo Park, CA 94025
14 Telephone: +1-650-614-7400
Facsimile: +1-650-614-7401

15 Attorneys for Defendant
ACER Inc.

16 Dated: May 17, 2010

Willenken Wilson Loh & Lief LLP

18
19 

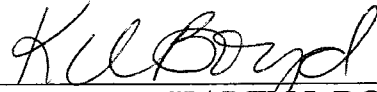
20 PAUL J. LOH

21 Paul J. Loh (State Bar No. ¹⁶⁰⁵⁴¹_A)
paulloh@willenken.com
22 WILLENKEN WILSON LOH & LIEB LLP
23 707 Wilshire Boulevard, Suite 3850
Los Angeles, California 90017
24 Telephone: +1-213-955-9240
Facsimile: +1-213-955-9250

25 Attorneys for Defendant BenQ Corp.
26
27
28

1 Dated: May 17, 2010

Turner Boyd LLP

2
3 

4 KAREN I. BOYD

5 Karen I. Boyd (State Bar No. 189808)
6 boyd@turnerboyd.com
7 Turner Boyd LLP
8 2625 Middlefield Rd. #675
9 Palo Alto, CA. 94306
10 Telephone: +1-650-533-7572
11 Facsimile: +1-650-472-8028

12 Attorneys for Defendant ASUSTeK
13 Computer Inc.